

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Monique Thacker,

Plaintiff,

v.

HSBC,

Defendant.

Civil Action No.

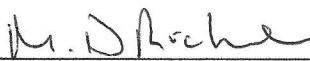
**DECLARATION OF
MARTIN RICHARDSON**

MARTIN RICHARDSON declares under penalty of perjury as follows:

1. My name is Martin Richardson and I am employed by HSBC Technology and Services USA as Co-Lead, Board Governance. In this capacity, I am familiar with the corporate structure of HSBC Bank USA, N.A., HSBC Securities, (USA) Inc. and their related companies. I submit this Declaration in support of Defendants' application for removal.
2. Plaintiff's Complaint names "HSBC" as a Defendant. There is no entity by the name of "HSBC."
3. Plaintiff Monique Thacker is an employee of HSBC Bank USA, N.A. Plaintiff's home address according to company records is 43 Marquis Court, Edgewater, New Jersey 07020.
4. HSBC Bank USA, N.A. is a national banking association with its main office located in the State of Virginia.
5. HSBC Securities (USA) Inc. is a corporation incorporated under the laws of the state of Delaware. HSBC Securities (USA) Inc.'s principal place of business is in New York, New York.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of August, 2022.


M. Richardson
MARTIN RICHARDSON